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ActionCOACH OneCo, LLC
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ACTIONCOACH NORTH AMERICA,
LLC, a Nevada limited liability company and
ACTIONCOACH ONECO, LLC, a Delaware
limited liability company,

Plaintiffs,

vs.

ALLISON DUNN, an individual; and DOE
INDIVIDUALS I-X and ROE
CORPORATIONS I-X,

Defendants.

Case No. 2:19-cv-02244-APG-DJA

**STIPULATION AND ORDER
TO EXTEND CASE MANAGEMENT
DEADLINES**

(First Request)

Pursuant to District of Nevada Local Rule 26-3, Plaintiffs ActionCOACH North America, LLC and ActionCOACH OneCo, LLC (together “ActionCOACH” or “Plaintiffs”) and Defendant Allison Dunn (“Defendant” or “Dunn”), hereby agree and stipulate to extend the remaining case management deadlines by 90 days, as follows:

1. A Statement Specifying the Discovery Completed. The parties have each made their initial disclosures. On May 15, 2020, Plaintiff’s counsel convened a telephonic Rule 26(f) conference. ActionCOACH served its initial Rule 26(a)(1)(A) disclosures on June 15, 2020. Dunn served her initial Rule 26(a)(1)(A) disclosures on July 8, 2020. In addition, the parties have each served one set of written discovery. On September 24, 2020, ActionCOACH served its first set of interrogatories and its first set of document requests upon Dunn. Dunn requested

1 and ActionCOACH granted Dunn a 10-day extension of time to serve written objections and
2 responses. Dunn served her written objections and responses on November 2, 2020. Dunn is
3 presently working on compiling responsive documents to produce in response to
4 ActionCOACH's document requests. Dunn served ActionCOACH with her first interrogatories
5 and her first document requests on November 10, 2020. ActionCOACH's written responses are
6 presently due on December 10, 2020. No party has served any subpoenas and no party has
7 noticed any depositions.

8 2. A Specific Description of the Discovery that Remains to be Completed.
9 ActionCOACH intends to follow-up on certain of Dunn's interrogatory answers and responses
10 to document requests through a meet-and-confer with Dunn's counsel. ActionCOACH must
11 also review Dunn's document production. ActionCOACH also intends to subpoena certain third
12 parties for whom Dunn provided business coaching services. ActionCOACH also intends to
13 take Dunn's deposition after it has reviewed her document production and after it has received
14 and reviewed subpoenaed documents. Dunn intends to obtain written responses and discovery
15 documents from ActionCOACH and take ActionCOACH's deposition.

16 3. The Reasons why the Deadline was not Satisfied. The parties have been slow to
17 conduct discovery in light of the current COVID-19 pandemic and associated restrictions on
18 travel and in-person meetings that have limited their ability to take effective, in-person,
19 depositions. It has been the parties' respective hope that such restrictions would be eliminated
20 by now, allowing for "normal" discovery methods to proceed. However, to date, that has not
21 occurred. In addition, ActionCOACH needs to review Dunn's document production and
22 documents it intends to obtain by subpoena before it can take her deposition. Further, Dunn
23 cannot yet take ActionCOACH's deposition because the time for ActionCOACH to respond to
24 Dunn's discovery requests has yet to run. In light of the foregoing, the parties agree that good
25 cause exists to extend the remaining case management deadlines.

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4. A Proposed Schedule for Completing all Remaining Discovery.

The parties proposed the following extension of the case management deadlines:

Current Remaining Deadlines	Proposed New Deadline
Discovery Cutoff – 12/11/2020	3/11/2021
Dispositive Motions – 1/11/2021	4/11/2021
Joint Pretrial Order – 2/10/2021	5/10/2021

Dated this 20th day of November, 2020

IT IS SO AGREED AND STIPULATED:

HOWARD & HOWARD
ATTORNEYS PLLC

LINCOLN, GUSTAFSON & CERCOS

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Attorneys for Defendant Allison Dunn

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: November 23, 2020